

Tom A. Howley, State Bar No. 24010115
JONES DAY
717 Texas Avenue, Suite 3300
Houston, Texas 77002
Telephone: (832) 239-3939
tahowley@jonesday.com

Brad B. Erens (admitted *pro hac vice*)
Joseph A. Florczak (admitted *pro hac vice*)
JONES DAY
77 West Wacker
Chicago, Illinois 60601
Telephone: (312) 782-3939
bberens@jonesday.com
jflorczak@jonesday.com

PROPOSED ATTORNEYS FOR DEBTORS

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
ERG Intermediate Holdings, LLC, <i>et al.</i> , ¹	§	Jointly Administered
	§	
Debtors.	§	Case No.: 15-31858-hdh-11

NOTICE OF RESCHEDULED HEARINGS

PLEASE TAKE NOTICE that hearings regarding the following matters have been rescheduled to **June 11, 2015**:

A. Final DIP Hearing

The hearing regarding final relief pursuant to the Motion for Entry of Interim and Final Orders Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code and Rule 4001 of the Federal Rules of Bankruptcy Procedure (A) Authorizing the Debtors to (I) Use Cash Collateral of the Pre-Petition Secured Parties, (II) Obtain Post-Petition Financing and (III) Provide Adequate Assurance Protection to the Pre-Petition Secured Parties, and (B)

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

Prescribing Form and Manner of Notice Of and Scheduling Final Hearing [Docket No. 15] (the "Final DIP Hearing"). The Final DIP Hearing was previously noticed and scheduled for June 1, 2015 [Docket No. 62].

B. Bid Procedures Hearing

The hearing regarding the bid procedures component (the "Bid Procedures Hearing") of the Debtors' Motion for Order for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief (the "Sale Motion") [Docket No. 20]. The Bid Procedures Hearing was initially noticed and scheduled for hearing on May 19, 2015 [Docket No. 46] and then subsequently rescheduled and noticed for June 1, 2015 pursuant to agreement of the parties in interest [Docket No. 93].

C. Venue Transfer Hearing

The hearing regarding the Motion of the Official Committee of Unsecured Creditors to Transfer Venue (the "Venue Transfer Motion") [Docket No. 94]. The Court granted the motion to shorten notice [Docket No. 95] regarding the Venue Transfer Motion on May 20, 2015 and scheduled a hearing regarding the Venue Transfer Motion on June 1, 2015 (the "Venue Transfer Hearing") [Docket No. 122].

PLEASE TAKE FURTHER NOTICE, that the Final DIP Hearing, the Bid Procedures Hearing and the Venue Transfer Hearing (collectively, the "June 11 Matters") will be held before the Honorable Judge Harlin D. Hale, United States Bankruptcy Judge, at the United States Bankruptcy Court, 1100 Commerce Street, 14th Floor, Courtroom #3, Dallas, TX 75242-1496 on **June 11, 2015 at 9:00 a.m. (CDT)**, or at such other time as the court may determine.

PLEASE TAKE FURTHER NOTICE that any objections or other responses regarding the June 11 Matters (an "Objection") must be filed on or before **June 4, 2015**

(the "Objection Deadline") with the Clerk of the Bankruptcy Court for the Northern District of Texas (the "Clerk's Office"), Earle Cabell Federal Building, 1100 Commerce St., Rm. 1254, Dallas, TX 75242-1496. At the same time, you must serve the Objection upon the most current Service List filed with the Court pursuant to the Order Granting Complex Chapter 11 Bankruptcy Case Treatment [Docket No. 61] so that such Objection is received by the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that any replies to any Objection (a "Reply") must be filed on or before **June 8, 2015** (the "Reply Deadline"). At the same time, you must serve the Reply upon the most current Service List filed with the Court pursuant to the Order Granting Complex Chapter 11 Bankruptcy Case Treatment [Docket No. 61] so that such Reply is received by the Reply Deadline.

Dated: May 29, 2015
Dallas, Texas

Respectfully submitted,

/s/ Tom A. Howley

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Houston, Texas 77002
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